

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Monday, June 23, 2008

From: Art Smith

To: Shane Hitchcock, EPA Region 4

Shawn Cecil, KDEP

Subject: Chevron Assumes Lead for Seep Response

Lewis Farm/Indian Oil Refinery

Georgetown, KY

Latitude: 38.2221130

Longitude: -84.5493800

POLREP No.:	2	Site #:	A4PM
Reporting Period:	4/28/2008 to 6/18/2008	D.O. #:	
Start Date:	4/18/2008	Response Authority:	CERCLA
Mob Date:	4/18/2008	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:		Contract #	
RCRIS ID #:			

Site Description

The Lewis Farm/Indian Oil Refinery Site is located on Lewis Lane in Georgetown, Scott County, Kentucky. The current land use is as a horse farm, but the site was operated as an oil refinery by the former Indian Oil Company from 1905-1916. Chevron Corporation (Chevron) is a Potentially Responsible Party (PRP) for this site, as a successor corporation to Indian Oil.

In November 2007, EPA conducted a sampling investigation at the site, as part of the Removal Site Evaluation (RSE). Based on the results of the sampling investigation, releases of hazardous substances are occurring at the site, or may occur. The spring or seep, which was the subject of the March 2004 NRC Report, was documented during the RSE as releasing a leachate into North Elkhorn Creek on an intermittent basis, as influenced by recharge to the subsurface.

On April 14, 2008, the OSC was notified by KDEP that a recreational boater had recently complained to the City of Georgetown concerning an oily film deposited on his canoe after traveling by the site along North Elkhorn Creek. A followup investigation by the OSC on April 18, 2008 confirmed that the leachate discharge continued to release unabated into Elkhorn Creek and that a time-critical removal action was necessary in order to mitigate the release. Chevron indicated to EPA that it was unable to conduct the required measures to stabilize the release, and the OSC promptly initiated the removal action under his delegated procurement and programmatic authorities.

The Region 4 Emergency and Rapid Response Services (ERRS) contractor (CMC, Inc.) mobilized to the site on April 18, 2008 to control the leachate discharge.

On June 13, 2008, Chevron assumed responsibility for continuing actions necessary to keep the seep discharge from entering North Elkhorn Creek.

(See Polrep Number 1 for additional background information on this site).

Current Activities

Removal activities conducted by EPA during the reporting period from April 28 through June 12, 2008 are summarized as follows:

a) Leachate discharge was contained and collected in a sump and then pumped to two 10,000 gallon pools for temporary storage. Leachate was treated by filtering the leachate through sorbent pads and then through sand. The treated water was discharged onto the ground in areas of known soil contamination. The water filtration media (sorbent pads, sand, and gravel) were replaced on a weekly basis. The spent media were placed into a roll-off box pending completion of arrangements for off-site disposal.

- b) On 5/18, CMC reported a dramatic increase in leachate volume collected at the seep. This required adding a second submersible pump to keep up with the increased flow. From 05/18-06/13, flows gradually decreased to a point where the second pump was no longer needed.
- c) Kentucky Utilities completed installation of a temporary electrical service for the onsite treatment operations. This required clearing of trees and brush and improvement of site roads in preparation for utility service installation.

Removal activities conducted by Chevron are as follows:

- d) Chevron contractor Conestoga-Rover and Associates (CRA) mobilized to the site on 06/02 to prepare the site for work. At CRA's request, EPA contractor CMC assisted by grading pads for 2-20,000 gallon frac tanks and an office trailer.
- e) Chevron is collecting the seep discharge by pumping it into frac tanks and then directly discharging the water from the frac tanks to the ground surface onsite as the tanks fill up. Samples of the discharge are collected weekly and analyzed for Target Compound List VOCs and SVOCs and TAL metals. The tanks allow for sufficient holding time to review analytical results in advance of discharge onto the ground at the site.
- f) OSC Smith visited the site on 06/18. At the time, the total volume pumped over a 5 day period was recorded at slightly less than 10,000 gallons, which is approximately 1.4 gallons per minute (gpm). CRA personnel onsite reported that the volume decrease at the seep has coincided with changing the point where stored water is discharged onto the ground.

Planned Removal Actions

Chevron is preparing a revised work plan to refine the tactics for addressing the seep discharge, such that the operations are less labor intensive over an extended period.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$200,000.00	\$108,935.00	\$91,065.00	45.53%
START	\$30,000.00	\$1,200.00	\$28,800.00	96.00%
REAC	\$20,000.00	\$0.00	\$20,000.00	100.00%
Intramural Costs				
Total Site Costs	\$250,000.00	\$110,135.00	\$139,865.00	55.95%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

response.epa.gov/lewisfarm